

KOHN, SWIFT & GRAF, P.C.

ONE SOUTH BROAD STREET, SUITE 2100
PHILADELPHIA, PENNSYLVANIA 19107-3304

JOSEPH C. KOHN
ROBERT A. SWIFT
GEORGE W. CRONER
ROBERT J. LAROCCA
DENIS F. SHEILS[†]
DOUGLAS A. ABRAHAMS *
WILLIAM E. HOESE
STEVEN M. STEINGARD *
STEPHEN H. SCHWARTZ[†]
CRAIG W. HILLWIG
NEIL L. GLAZER[†]
JARED G. SOLOMON
BARBARA L. MOYER[†]

(215) 238-1700
TELECOPIER (215) 238-1968
FIRM E-MAIL: info@kohnsswift.com
WEB SITE: www.kohnsswift.com

E-MAIL: RSWIFT@KOHNSWIFT.COM

HAROLD E. KOHN
1914-1999

OF COUNSEL
MERLE A. WOLFSON
LISA PALFY KOHN

July 26, 2013

VIA FAX

[†] ALSO ADMITTED IN NEW YORK
[◊] ALSO ADMITTED IN NEVADA
^{*} ALSO ADMITTED IN NEW JERSEY

Honorable Alvin K. Hellerstein
Room 1050
United States Courthouse
500 Pearl Street
New York, NY 10007

Re: Aldo Vera v. The Republic of Cuba, No. 12 Civ. 1596

Dear Judge Hellerstein:

I am one of the counsel for Plaintiff Vera in the above matter and am appearing *pro hac vice*. Following the hearing on June 25, counsel for the three judgment creditors engaged in discussion to consider working jointly in execution on their respective judgments. The three judgment creditors, Vera, Hausler and Villoldo, reached agreement today and will move forward cooperatively to file complaints against garnishee banks. The judgment creditors have agreed not to pursue the following motions *inter se*: ECF #'s 251 and 255. In addition, they have agreed to consolidation of newly filed execution proceedings going forward in the *Vera* action.

The judgment creditors intend to proceed cooperatively in three modes:

1. Vera will submit either stipulated turnover orders or proposed turnover orders as to three garnishee banks which do not contest Vera's turnover motions. Hausler and Villoldo will covenant not to sue those three bank in connection with the turnover of the blocked accounts, effectively concluding the claims as to these three banks.
2. The judgment creditors will file a joint complaint as to two garnishee banks which do not contest turnover but do insist on notification to potential third parties. This will be denominated as a related case to the *Vera* action.
3. The judgment creditors will file a separate joint complaint as to all other garnishee banks, which number over 25. This also will be denominated as a related case to the *Vera* action.

Because the judgment creditors only reached agreement today, counsel are unable to meet the Court's deadline of July 26 (today) to file a joint complaint. Accordingly, counsel request the Court's indulgence to extend the time to do the above until August 21, 2013, with the expectation that items 1 and 2 will be accomplished sooner.

To effectively notify all counsel of record of the above, this letter is being filed via ECF.

Respectfully yours,

A handwritten signature in cursive script, appearing to read "Robert A. Swift".

Robert A. Swift

RAS:yr

Cc via ECF e-mail: All Counsel

So ordered:

Alvin Hellerstein, U.S.D.J.